



2. The employment acts alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Western District of Missouri.

### PARTIES

3. Plaintiff, the Equal Employment Opportunity Commission (the “Commission”), is the agency of the United States of America charged with the administration, interpretation and enforcement of Title VII, and is expressly authorized to bring this action by Section 706(f)(1) and (3) of Title VII, 42 U.S.C. §§ 2000e-5(f)(1) and (3).

4. At all relevant times, Defendant Comprehensive Human Services has been a Missouri corporation, continuously engaged in business in the State of Missouri in the City of Columbia, and has had at least 15 employees continuously.

5. At all relevant times, Defendant has continuously been an employer engaged in an industry affecting commerce within the meaning of Sections 701(b), (g) and (h) of Title VII, 42 U.S.C. §§ 2000e(b), (g) and (h).

### STATEMENT OF CLAIMS

6. More than thirty days prior to the institution of this lawsuit, Nancy Gause filed a charge with the Commission alleging violations of Title VII by Defendant. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. Since at least August 12, 2008, following Gause’s complaint to Sharon Ginsburg, Vice President of the Board of Directors, Defendant has engaged in the following unlawful employment practices in violation of Section 703(a) of Title VII, 42 U.S.C. § 2000e-2(a) and 704(a) of Title VII, 42 U.S.C. § 2000e-3(a):

(a) On or about August 18, 2008, Gause was fired in retaliation for complaining to

**Mary Beth Schillinger, President of Defendant's board of directors and to Sharon Ginsburg, Vice President of Defendant's board of directors** about sexual harassment on the part of Executive Director Voltmer;

- (b) On August 18, 2008, Lawson was repeatedly pressured to resign and was ultimately demoted and given a lower salary in retaliation for complaining to **Mary Beth Schillinger, President of Defendant's board of directors**, of sexual harassment on the part of Executive Director Voltmer;

8. The effect of the practices complained of in paragraph 7 (including sub-parts (a) and (b)) above has been to deprive Ms. Gause and Ms. Lawson of equal employment opportunities and otherwise adversely affect their status as employees **because they protested the sexual harassment of Defendant's employees by Leigh Voltmer.**

9. The unlawful employment practices complained of in paragraph 7 (including sub-parts (a) and (b)) above were intentional.

10. The unlawful employment practices complained of in paragraphs 7 (including sub-parts (a) and (b)) above were done with malice or with reckless indifference to the federally protected rights of Ms. Gause and Ms. Lawson.

#### PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in retaliation.

B. Order Defendant to institute and carry out policies, practices, and programs which provide equal employment opportunities for women, and which eradicate the effects of its past and present unlawful employment practices.

C. Order Defendant to make whole Ms. Gause by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraph 7 above, in amounts to be determined at trial.

D. Order Defendant to make whole Ms. Gause by providing compensation for past and future nonpecuniary losses resulting from the unlawful employment practices described in paragraph 7 above, including emotional pain, suffering and humiliation, in amounts to be determined at trial.

E. Order Defendant to pay Ms. Gause punitive damages for its malicious and reckless conduct described in paragraph 7 above, in amounts to be determined at trial.

F. Order Defendant to make whole Ms. Lawson by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraph 7 above, in amounts to be determined at trial.

G. Order Defendant to make whole Ms. Lawson by providing compensation for past and future nonpecuniary losses resulting from the unlawful employment practices described in paragraph 7, including emotional pain, suffering and humiliation, in amounts to be determined at trial.

H. Order Defendant to pay Ms. Lawson punitive damages for its malicious and reckless conduct described in paragraph 7 above.

I. Grant such further relief as the Court deems necessary and proper in the public interest.

J. Award the Commission its costs of this action.

JURY TRIAL DEMAND

The Commission requests a jury trial on all questions of fact raised by its complaint.

Respectfully submitted,

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REQUEST FOR PLACE OF TRIAL

Plaintiff requests that the trial of this action take place in Kansas City, Missouri

Respectfully submitted,

/s/ Jan Shelly  
JAN SHELLEY